

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD and
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 2:23-CV-00103-JRG-RSP

JURY TRIAL DEMANDED

**DEFENDANTS' UNOPPOSED MOTION TO REDACT PORTIONS OF THE
APRIL 21, 2025 – APRIL 25, 2025 TRIAL TRANSCRIPT**

Defendants Samsung Electronics Co., Ltd and Samsung Electronics America, Inc. (collectively, “Samsung”) respectfully submit this motion to redact certain limited portions of the April 21, 2025 through April 25, 2025 trial transcript. On July 15, 2025, Samsung notified the Court of its intent to request redactions of this transcript. Dkt. 458.

I. BACKGROUND

During trial, the parties and the Court discussed matters designated as “CONFIDENTIAL – ATTORNEYS’ EYES ONLY” under the Protective Order (Dkt. 65).

II. REQUEST FOR REDACTION

“The ‘right to inspect and copy judicial records is not absolute.’” *See Erfindergemeinschaft Uropep GbR v. Eli Lilly & Co.*, Case No. 2:15-cv-1202-WCB, 2017 U.S. Dist. LEXIS 14099, at *3 (E.D. Tex. Feb. 1, 2017) (quoting *Nixon v. Warner Commc’ns, Inc.*, 435 U.S. 589, 598 (1978)). “The decision whether to allow public access to court records is left to the ‘sound discretion of the trial court . . . to be exercised in light of the relevant facts and circumstances of the particular case.’” *Id.* (quoting *Nixon*, 435 U.S. at 599). “Where the materials relate to non-dispositive issues, the interest in disclosure is less compelling. In particular, the materials filed in connection with discovery disputes unrelated to the merits of the case have been identified as the kinds of court materials for which there is not a compelling need for public disclosure; the presumption of disclosure has therefore been held inapplicable in that setting.” *Id.* at *5.

Samsung requests that the Court order the redaction of the material discussed on the following pages of the April 21, 2025 trial transcript:

Page	Line No(s)	Reason
156	20	Reveals confidential Samsung business information

Samsung requests that the Court order the redaction of the material discussed on the following pages of the April 22, 2025 trial transcript:

Page	Line No(s)	Reason
325	9-12	Reveals confidential details concerning third party Google technology
326	20-25	Reveals confidential details concerning third party Google technology
327	1, 12-17	Reveals confidential details concerning third party Google technology
529	8-10	Reveals confidential Samsung business information
530	15	Reveals confidential Samsung business information
540	11-14	Reveals confidential Samsung business information; Reveals confidential details concerning confidential commercial agreements with third party Google
540	25	Reveals confidential Samsung business information; Reveals confidential details concerning confidential commercial agreements with third party Google
541	1-2	Reveals confidential Samsung business information; Reveals confidential details concerning confidential commercial agreements with third party Google
542	2-3	Reveals confidential Samsung business information
543	25	Reveals confidential Samsung business information
544	1-2	Reveals confidential Samsung business information
547	14	Reveals confidential Samsung business information
554	2-7	Reveals confidential Samsung business information; Reveals confidential details concerning confidential commercial agreements with third party Google
562	6-7, 19	Reveals confidential Samsung business information
582	10, 17, 21-22	Reveals confidential Samsung business information
596	11	Reveals confidential Samsung business information
597	6-7	Reveals confidential Samsung business information
609	7	Reveals confidential Samsung business information
614	18-25	Reveals confidential Samsung business information; Reveals confidential details concerning license agreements with third parties
615	1-25	Reveals confidential Samsung business information; Reveals confidential details concerning license agreements with third parties



Page	Line No(s)	Reason
616	1-14	Reveals confidential Samsung business information; Reveals confidential details concerning license agreements with third parties
633	11	Reveals confidential Samsung business information
634	1-2	Reveals confidential Samsung business information

Samsung requests that the Court order the redaction of the material discussed on the following pages of the April 23, 2025 trial transcript:

Page	Line No(s)	Reason
678	9, 11, 17	Reveals confidential Samsung business information
680	1, 12	Reveals confidential Samsung business information
688	17	Reveals confidential Samsung business information
689	6-7	Reveals confidential Samsung business information
690	10, 13-14	Reveals confidential Samsung business information
696	7, 11	Reveals confidential Samsung business information
702	12	Reveals confidential Samsung business information
704	8, 10	Reveals confidential Samsung business information
817	15-17	Reveals confidential details concerning third party Google technology
818	23-25	Reveals confidential details concerning third party Google technology
819	1	Reveals confidential details concerning third party Google technology
832	1-2	Reveals confidential details concerning third party Google technology

Samsung requests that the Court order the redaction of the material discussed on the following pages of the April 24, 2025 trial transcript:

Page	Line No(s)	Reason
990	4	Reveals confidential Samsung business information
992	11	Reveals confidential Samsung business information
994	12	Reveals confidential Samsung business information
995	1-2	Reveals confidential Samsung business information
1004	12, 16	Reveals confidential Samsung business information



Page	Line No(s)	Reason
1037	16	Reveals confidential Samsung business information

Samsung’s requested redactions are highlighted in Exhibit A, attached hereto. Where possible, these redactions were targeted so as not to include the entire line.

III. CONCLUSION

Samsung respectfully requests that the Court grant its unopposed motion to redact the April 21, 2025 – April 25, 2025 trial transcript and enter the redacted transcript containing the proposed redactions attached as Exhibit A into the public record.

Dated: August 4, 2025

Respectfully submitted,

By: /s/ Jonathan B. Bright

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**ATTORNEYS FOR DEFENDANTS
SAMSUNG ELECTRONICS CO., LTD. AND
SAMSUNG ELECTRONICS AMERICA, INC.**

CERTIFICATE OF CONFERENCE

Pursuant to Local Rules CV-7(h) and (i), I hereby certify that counsel of record for Samsung and Headwater have met and conferred. Headwater does not oppose this motion.

/s/ Jonathan B. Bright
Jonathan B. Bright

CERTIFICATE OF AUTHORIZATION TO FILE UNDER SEAL

I certify that the following document is authorized to be filed under seal pursuant to the Protective Order in this case.

/s/ Jonathan B. Bright
Jonathan B. Bright

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was filed electronically in compliance with Local Rule CV-5 on August 4, 2025. As of this date, all counsel of record had consented to electronic service and are being served with a copy of this document through the Court's CM/ECF system under Local Rule CV-5(a)(3)(A).

/s/ Jonathan B. Bright
Jonathan B. Bright